

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: Docket No. 466

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' MOTION FOR ENTRY
OF AN ORDER EXTENDING THE DEADLINE BY WHICH DEBTORS
MAY FILE NOTICES TO REMOVE ACTIONS**

The undersigned hereby certifies that, as of the date hereof, no answer, objection, or any responsive pleading to the *Debtors' Motion for Entry of an Order Extending the Deadline by Which Debtors May File Notices to Remove Actions* [Docket No. 466] (the “**Motion**”) filed by the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”) on September 22, 2023.

The undersigned further certifies that they have reviewed the Court’s docket in these cases and no answer, objection, or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Motion and Hearing filed contemporaneously with the Motion, responses to the Motion were to be filed no later than 4:00 p.m. (Eastern Daylight Time) on October 6, 2023 (the “**Objection Deadline**”). The Debtors therefore respectfully request that the proposed form of order attached hereto as **Exhibit A**, which is materially in the same form filed with the Motion, be entered at the earliest convenience of the Court.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Dated: October 12, 2023
Wilmington, Delaware

Respectfully submitted,

<p><u>/s/ Morgan L. Patterson</u> WOMBLE BOND DICKINSON (US) LLP Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com</p> <p><i>Proposed Counsel to the Debtors and Debtors in Possession</i></p>	<p>WHITE & CASE LLP Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 tlauria@whitecase.com mbrown@whitecase.com fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>) Doah Kim (admitted <i>pro hac vice</i>) RJ Szuba (admitted <i>pro hac vice</i>) 555 South Flower Street, Suite 2700 Los Angeles, CA 90071 Telephone: (213) 620-7700 rkampfner@whitecase.com doah.kim@whitecase.com rj.szuba@whitecase.com</p> <p><i>Co-Counsel to Debtors and Debtors in Possession</i></p>
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